DOCKET FILE COPY ORIGINAL ORIGINAL

RECEIVED

JUL 27 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
1993 Annual Access Tariff Filings	)	CC Docket No. 93-193
Tariffs of Local Exchange Carriers	)	

<u>Direct Case of Bell Atlantic</u>

As shown in the following response to the Commission's

1. Have the LECs borne their burden of demonstrating that implementing SFAS-106 results in an exogenous costs change for the TBO amounts under the Commission's price cap rules?

A. Bell Atlantic met the Commission's Control Test for Exogenous Treatment of its OPEB Costs.

In its opposition to petitions to reject, suspend or investigate,[3] Bell Atlantic explained the potential legal limitations on an employer seeking to modify the health and life benefits of existing retirees.[4] In Exhibit 2, Bell Atlantic provides its union agreements and communications to employees concerning changes in retirement benefits. None of these changes affect the calculation of the TBO, and all of them apply strictly prospectively to future retirees. Indeed, the August 17, 1989 Memorandum of Understanding with unions representing Bell Atlantic employees recognizes the unions as the bargaining agent only for those retirees who retired after the date of the agreement.[5]

Courts have found that failure to reserve a right to amend benefits can limit an employer's ability to make subsequent changes.[6] In addition, some courts have also held that, absent a specific exclusion, a union contract may confer an ongoing right to retirement benefits. For example, the Sixth Circuit held that when parties contract for benefits that accrue upon achievement of

---

[3] *See* Bell Atlantic Transmittal No. 565, filed May 10, 1993 ("Bell Atlantic Opposition").

[4] Bell Atlantic here only seeks exogenous treatment for the Transitional Benefit Obligation ("TBO") costs of existing retirees.

[5] *See* Attachment 2, August 17, 1989 Post Retirement Medical, Memorandum of Understanding, pp. 39, 41.

[6] Bell Atlantic Opposition at 3, 4.

retiree status, "there is an inference that the parties likely intended those benefits to continue as long as the beneficiary remains a retiree."[7] Other courts have gone even farther, ruling that the "status of a retiree cannot be affected by future negotiations or agreements between the Company and the Union."[8] If a court finds that neither the company nor the union "can act on behalf of retirees,"[9] there is no realistic mechanism to change benefits for existing retirees.

Because of these types of potential restrictions, it would be unreasonable for the Commission to find that a LEC has the freedom to reduce the benefits of its already retired workers.

B. <u>There is no "double counting" of the SFAS-106 exogenous costs.</u>

retired employees, it is an actuarially-determined cost based on a count of actual employees, not an estimate. This amount has already been booked in Bell Atlantic's accounting records in conformity with Generally Accepted Accounting Principles ("GAAP") and has been subject to independent audits. To further support its actuarial calculations, Exhibit 1 provides documents from the Company's Actuarial Reports used to calculate OPEB costs.

2. There is no "double counting" related to the rate of <u>return on initial price caps.</u>

There is no factual support for suggestions that some portion of SFAS-106 costs may be double counted because LEC stock prices could reflect an anticipation of SFAS-106 costs. As set forth in the Bell Atlantic Opposition (p. 7), several petitioners cited an article indicating that OPEB did *not* affect stock prices. Moreover, the average price of RBOC stock *rose* 35% between January 1, 1986 and December 31, 1988.[10] There is simply no basis to assume that anticipation of the impact of SFAS-106 prior to its implementation caused RBOC stock prices to fall.

therefore no double counting could have taken place.

1.a. We direct the LECs to provide evidence of and describe the ranges of data on the age of the workforce, the ages at which employees will retire, and the length of service of retirees, presented by their actuaries and used by the companies to compute OPEB amounts claimed in the annual access transmittals.

Exhibit 1 to this document contains extracts from 1991 Actuarial Reports[11] used by the Company to calculate OPEB costs. Attachments include the following:

♦Distribution of Retirees by Age and Service - Management
♦Distribution of Retirees by Age and Service - Associate
♦Length of Service by Age - Management
♦Length of Service by Age - Associate
♦Annual Rate of Employee Separation from Service (Male) Mgmt.
♦Annual Rate of Employee Separation from Service (Female) Mgmt.
♦Annual Rate of Employee Separation from Service (Male) Assoc.
♦Annual Rate of Employee Separation from Service (Female) Assoc.
♦Annual Rates of Retirement on Pension (Male) Mgmt.
♦Annual Rates of Retirement on Pension (Female) Mgmt.
♦Annual Rates of Retirement on Pension (Male) Assoc.
♦Annual Rates of Retirement on Pension (Female) Assoc.

1.b. We direct the LECs to provide pertinent sections of their employee handbooks, contracts with unions, and other items that include statements to the employees concerning the company's ability to modify its post-employment benefits package.

Exhibit 2 to this document contains pertinent communications with employees concerning changes to post retirement benefits, as well memoranda of understanding with Bell Atlantic's unions concerning changes to post retirement benefits as follows:

♦August 17, 1989, Post Retirement Medical, Memorandum of Understanding;
♦August 22, 1992, Post Retirement Medical, Memorandum of Understanding;
♦"Changes in Benefits for Non-Management Employees", 1989;
♦Highlights of 1992 Tentative Bargaining Agreement for Common Issues;
♦Management Bulletin No. 15, July 23, 1991; and

---

[11] The reports were prepared by Actuarial Sciences Associated, Inc.

♦Salaried Bulletin No. 17, August 1991.

2. How should price cap LECs reflect amounts from prior year sharing or low-end adjustments in computing their rates of return for the current year's sharing and low-end adjustments to price cap indices?

A. Bell Atlantic followed Commission rules for sharing.

In its tariff filing, Bell Atlantic properly treated sharing as a one-time occurrence and did not add-back the previous year's sharing in its current calculations. In doing so, Bell Atlantic followed existing price cap rules, which do not contemplate add-back of sharing or exclusion of Lower Formula Adjustment revenues.[12]

In its Notice of Proposed Rulemaking, the Commission recognized that an add-back requirement "was neither expressly discussed in the LEC price cap orders nor clearly addressed in [Commission] rules."[13] The Commission conceded that there is no add-back requirement in the existing rules when it recognized that it could not require add-back of sharing or exclusion of Lower Formula Adjustment revenues without a NPRM. Moreover, the Commission explicitly conceded the need for a clear rule in the

---

[12] *See Amendment of Part 65, Interstate Rate of Return Prescription: Procedures and Methodologies to Establish Reporting Requirements*, Report and Order, 1 FCC Rcd 952 at ¶ 45 (1986); CC Docket No. 86-127, Specifications, General Instruction F ("Revenues should include revenues earned during the report period").

[13] *Price Cap Regulation of Local Exchange Carriers Rate of Return Sharing and Lower Formula Adjustment*, Notice of Proposed Rulemaking, CC Docket No. 93-179, ¶ 4 (rel. July 6, 1993) ("Add-Back NPRM").

Add-Back NPRM.[14] In the face of these concessions that any change in the treatment of sharing must come as a result of a rulemaking, the Commission cannot impose changes in advance of that rulemaking.

The Commission's suspension of LEC tariffs on the add-back issue also is inconsistent with its acceptance of no interest on the amount of under-earnings that occur before the effective date of the low-end adjustment.[15] The Commission recognized that the later requires a rule change and cannot serve as a basis to suspend current rates.

B. Imposition of an add-back requirement on the 1993 annual price cap tariffs would be unlawful retroactive rulemaking.

Because there is currently no add-back requirement, imposition of a new rule on the previously filed tariff would constitute retroactive rulemaking and would thereby exceed the Commission's authority under the Administrative Procedure Act.[16] A statutory grant of legislative rulemaking authority is not generally "understood to encompass the power to promulgate retroactive rules unless that power is conveyed by Congress in express terms."[17] The "only plausible reading" of the Administrative Procedure Act, is

---

[14] "[W]e are establishing this docket to . . . incorporate 'add-back' clearly into the LEC price cap rules." Add-Back NPRM at ¶ 4.

[15] *See 1993 Annual Access Tariff Filings*, Memorandum, Opinion and Order Suspending Rates and Designating Issues for Investigation at n.73, CC Docket No. 93-193 (rel. June 23, 1993).

[16] *See* 5 U.S.C. § 551, *et seq.*

[17] *Bowen v. Georgetown University Hospital*, 488 U.S. 204, 208 (1988).

that its rulemaking authority is prospective only.[18]

After issuing the Add-Back NPRM, the Commission cannot credibly suggest that this rule change "merely clarifies and elaborates the original Price Cap Order."[19] A rule change issued months from now cannot serve as the basis for rejecting a tariff for existing rates filed months earlier.[20] Such an action would not merely "affect past transactions," it would alter their "legal consequence" and would thereby be unlawful.[21]

C. The Commission's suggested modification of the current price cap rules is a major policy change, more appropriately <u>addressed as part of its overall review of price cap policy.</u>

The proposal to mandate add-back of sharing and exclusion of Lower Formula Adjustment revenues contradicts and undermines the stated purposes of the Commission in its Price Cap Reconsideration Order:

> We have designed the sharing and adjustment mechanisms to intrude as little as possible on the intended incentives and benefits of the price cap plan, while assuring that LEC rates remain just and reasonable.[22]

Add-back of sharing and exclusion of Lower Formula Adjustment

---

[18] *Bowen*, 488 U.S. at 216 (Scalia J., concurring).

[19] *American Telephone and Telegraph Co. v. Federal Communications Commission*, 974 F.2d 1351, 1355 (D.C. Cir. 1992).

revenues allows these one-time adjustments to affect rates for years afterward. Such an expansion of these limited exceptions constitutes a major intrusion on the price cap incentive structure and, thereby, undermines the benefits of the price cap plan.

Commission review of such a restructure of the price cap plan is appropriate only in the context of an overall review of the effectiveness of the current plan. Isolated adjustments to one aspect of the plan would undermine the Commission's overall review, scheduled to begin at the end of this year.[23] Prior to that review, the Commission has no basis to move away from a price cap system. If, as the Commission has declared, price caps provide LECs "the incentive to make the most efficient use of their resources,"[24] then the Commission should reject proposals such as the present one that undermine those incentives. If the Commission determines that further evaluation of these proposed modifications is warranted, then such evaluation should await the already scheduled formal review.

3. Should Bell Atlantic be permitted to exclude end user charge revenues from the common line basket for the purpose of computing sharing obligations?

The Commission's inquiry here is not on the amount of Bell

---

[23] *See* Price Cap Order, ¶ 386 ("To provide a fair evaluation of the program, it is also important that the initial period before periodic review and the possibility of major adjustments be long enough for incentives to operate").

[24] Reevaluation Order at ¶ 14.

Atlantic's sharing,[25] but rather on the allocation of sharing among price cap baskets. AT&T's claim, which seeks this reallocation, is inconsistent with the Commission's Price Cap Rules.

Sharing was incorporated into the Price Cap Rules for two purposes: (1) it functions as a "productivity backstop", and (2) it requires Price Cap LECs to share with customers the financial benefits of interstate earnings above designated levels as a result of actual productivity gains through a one-time prospective rate reduction.[26]

End user rates -- subscriber line charges (SLCs) -- are determined in compliance with § 61.38 of the Commission's Rules and are unrelated to LEC productivity gains. SLCs are based on a forecast of the Base Factor Portion (BFP) revenue requirement divided by a forecast of demand for the test period.[27] This forecast, in essence, retargets these rates to an 11.25% rate of return. Unlike other rates, however, these rates are not affected by the Price Cap indices, including the productivity factor.

Bell Atlantic's exclusion of SLC revenues from the allocator used to apportion sharing among the price cap baskets was appropriate and should be ratified by the Commission. To include

---

[25] The calculation of this amount is correct and is explained in Section 5 of its 1993 Annual Price Cap Filings. *See* Bell Atlantic Transmittal No. 565, filed April 2, 1993; Bell Atlantic Transmittal No. 568, filed May 3, 1993, and amended June 17, 1993; Bell Atlantic Transmittal No. 577, filed June 17, 1993; and Bell Atlantic Transmittal No. 579, filed June 29, 1993.

[26] *See* Price Cap Order, ¶¶ 7-9, 120-163; Reconsideration Order, ¶¶ 86-88.

[27] *See* 47 C.F.R. § 61.38.

SLCs -- based on forecasted costs and demand -- in calculating the allocation of sharing amounts would unreasonably weight the Common Line Basket. Sharing amounts, after all, are based on productivity gains, so allocating sharing amounts on revenues that are not affected by productivity is not a cost causative approach.[28] To the contrary, such an approach would result in other baskets not receiving the appropriate benefit for their productivity gain.

4. Has Bell Atlantic correctly calculated the "g" factor? Also, should the fact that revenues in the PCI calculation are over an entire year require that other factors in the PCI formula be treated consistently? Should an average line count apply to both the base year and the base year minus one?

Bell Atlantic correctly calculated the "g" factor in its annual price cap filings. The "g" factor represents the growth of minutes per access line, 50% of the benefit of which is shared with ratepayers.[29] The base period for the 1993 Annual Access Tariff filing is 1992, and the previous base period is 1991. In calculating its "g" factor, Bell Atlantic has consistently used the end-of-year number of access lines. For the first time, AT&T suggests the rules require use of base period average number of lines.[30] AT&T is wrong, and it would be inappropriate for Bell

---

[28] *See* Reconsideration Order, ¶ 113.

[29] *See* 47 C.F.R. § 61.45(c).

[30] *See 1993 Annual Access Tariff Filings*, Petition of American Telephone and Telegraph Co. (AT&T), Appendix G, filed April 27, 1993. AT&T also suggested that Bell Atlantic incorrectly used special access lines subject to the surcharge in its calculation

Atlantic to now switch to a methodology inconsistent with its practice over time.

The Commission has recognized that the basis for determining minutes and lines must be consistent from year to year. For example, the Commission required that the 1991 minutes of use and number of subscriber lines used in the 1992 Tariff Revenue Plan ("TRP") should be used in calculating "g" in the 1993 Annual Access Tariff Filing.[31] Since Bell Atlantic has consistently used end of period lines in calculating "g", no revision is necessary.

If the Commission decides to require a change -- which it should not -- the impact of changing to average lines from end of period lines for all periods should be reflected in the Common Line PCI. This impact would result in an increase of the Common Line Basket's PCI. Exhibit 3 to this document is an analysis that compares results using end of period versus average lines. Average lines would have generated a smaller "g" in the 1991 and 1992 annual filings. AT&T, however, only complained of a problem in 1993, when it would benefit by an adjustment.

Commission rules require evenhanded enforcement. Bell Atlantic's "g" factor was appropriate in 1991 and it is appropriate today. All of the individual factors underlying the "g" calculations represent annual amounts, and there is no distortion in the calculation. Applied consistently over time, as Bell Atlantic has, these amounts provide a proper calculation that

---

[31] *See Commission Requirements for Cost Support Material to be*

should not be undermined by recent complaints.

5. Have the LECs properly reallocated GSF costs in accordance with the GSF Order?

The GSF Order required LECs to reflect the reallocation of General Support Facilities costs in the tariffs to become effective on July 1, 1993. The Order also concluded that it is appropriate to allow price cap LECs to treat as exogenous the reallocation of GSF costs.[32]

As required by the Order,[33] Bell Atlantic restated 1992 ARMIS

6. To what category or categories should the LIDB per query charges be assigned?

Bell Atlantic appropriately assigned its Line Identification Data Base ("LIDB") per query charges to the Transport Category in the Traffic Sensitive Basket for two reasons. First, one of Bell Atlantic's per query charges is a Query Transport charge. LIDB, therefore, is associated with a transport function. Second, the costs associated with providing LIDB are currently included in the Part 69 Transport element. Therefore, it is proper for Bell Atlantic to assign the LIDB per query charges to the Transport Category.

Conclusion

None of the issues designated by the Commission provide grounds for any alteration of Bell Atlantic's tariffs. The Commission should conclude its investigation and grant final tariff approval.

Respectfully submitted,

The Bell Atlantic Telephone Companies

By Their Attorneys

Edward Shakin /JL

Edward Shakin

Edward D. Young, III
Michael Lowe
Of Counsel

1710 H Street, N.W.
Washington, D.C. 20006
(202) 392-1551

Dated: July 27, 1993

EXHIBIT 1

Bell Atlantic Corporation
Management
Distribution of Retirees as of 1/1/91 by Age and Service

Service and Disability Pensioners

Age as of 1/1/91	Service at Retirement < 15	15-19	20-24	25-29	30-34	35-39	> 39	Total
< 35	3	4	0	0	0	0	0	7
35-39	0	3	0	0	0	0	0	3
40-44	0	6	8	0	0	0	0	14
45-49	0	6	7	5	30	0	0	48
50-54	0	8	9	75	567	20	0	679
55-59	0	3	89	214	1,382	811	18	2,517
60-64	2	23	126	286	1,268	1,748	489	3,942
65-69	5	28	132	203	788	1,734	977	3,867
70-74	7	19	61	142	457	788	701	2,175
75-79	4	4	35	71	169	283	449	1,015
80-84	0	3	20	43	85	279	861	1,291
85-89	0	0	8	18	38	149	469	682
> 89	0	0	9	10	26	53	125	223
Total	21	107	504	1,067	4,810	5,865	4,089	16,463

* 21 retirees were not included because information was unavailable.

7/8/93 PL

Bell Atlantic Corporation
Associate
Distribution of Retirees as of 1/1/91 by Age and Service

Service and Disability Pensioners

Age* as of 1/1/91	Service at Retirement							
	< 15	15-19	20-24	25-29	30-34	35-39	> 39	Total
< 35	7	3	0	0	0	0	0	10
35-39	1	22	2	0	0	0	0	25
40-44	0	41	27	1	0	0	0	69
45-49	0	38	34	23	23	0	0	118
50-54	0	41	49	84	409	17	0	600
55-59	1	73	248	289	1161	321	16	2,109
60-64	1	158	692	728	1561	1407	494	5,041
65-69	32	260	783	706	1241	1493	797	5,312
70-74	90	205	486	541	723	783	439	3,267
75-79	37	84	352	364	471	370	351	2,029
80-84	0	53	279	289	386	406	696	2,109
85-89	0	18	141	93	137	166	399	954
> 89	0	4	26	28	48	58	107	271
Total	169	1,000	3,119	3,146	6,160	5,021	3,299	21,914

* 50 retirees were not included because information was unavailable.

7/8/93 PL

BELL ATLANTIC CORPORATION

MANAGEMENT

EXHIBIT IX (Continued)

ACTIVE DATA BY AGE AND SERVICE

AS OF JANUARY 1, 1991

Length of Service (Completed Years)

BELL ATLANTIC CORPORATION

MANAGEMENT

EXHIBIT X (Continued)

RETIREE* DATA BY AGE

BELL ATLANTIC CORPORATION

ASSOCIATE

EXHIBIT VIII (Continued)

ACTIVE DATA BY AGE AND SERVICE

AS OF JANUARY 1, 1991

	Length of Service (Completed Years)							
Age	**0-4**	**5-9**	**10-14**	**15-19**	**20-24**	**25-29**	**30 & Over**	**TOTAL**
Under 20	304	0	0	0	0	0	0	304
20-24	2,659	34	0	0	0	0	0	2,693
25-29	2,466	874	290	0	0	0	0	3,630
30-34	1,499	1,116	2,598	306	0	0	0	5,519
35-39	1,097	617	2,284	4,792	1,758	0	0	10,548
40-44	728	296	1,098	3,282	6,456	559	0	12,419
45-49	304	145	439	954	2,932	1,877	207	6,858
50-54	135	89	277	570	1,213	863	1,344	4,491
55-59	71	28	148	392	683	412	2,225	3,959
60-64	21	21	82	195	341	211	1,066	1,937
Over 64	2	7	18	34	46	19	77	203
TOTAL	9,286	3,227	7,234	10,525	13,429	3,941	4,919	52,561

The Average Age is 41.2
The Average Length of Service is 16.7

BELL ATLANTIC CORPORATION

ASSOCIATE

EXHIBIT IX (Continued)

RETIREE* DATA BY AGE

AS OF JANUARY 1, 1991

Age	Male	Female	Total
Under 45	35	73	108
45-49	40	83	123
50-54	154	450	604
55-59	804	1,323	2,127
60-64	1,953	3,105	5,058
65-69	2,023	3,291	5,314
70-74	1,076	2,191	3,267
75-79	383	1,646	2,029
80-84	337	1,772	2,109
85-89	197	757	954
Over 89	57	214	271
TOTAL	7,059	14,905	21,964

The average age of the retirees is 68.5.

* Includes Service and Disability Pensioners.

Bell Atlantic Corporation

Annual Rates of Employee Separation From Service Before Eligibility To Service Retirement

Male Employees

Management

Service in years t	Rates of separation during year t + .5 to t + 1.5 for employees entering service at specimen ages							
	15	20	25	30	35	40	45	50
0	.104	.105	.105	.102	.096	.091	.088	.088
1	.073	.072	.070	.066	.062	.059	.058	.058
2	.045	.045	.044	.042	.040	.037	.034	.035
3	.019	.026	.032	.032	.025	.025	.030	.030
4	.017	.019	.027	.025	.018	.020	.021	.025
5	.013	.016	.024	.021	.016	.016	.018	.021
6	.012	.014	.021	.018	.016	.015	.015	.018
7	.011	.013	.018	.016	.016	.012	.013	.022
8	.009	.011	.016	.015	.016	.012	.012	.026
9	.009	.010	.013	.014	.013	.010	.013	.029
10	.008	.008	.012	.013	.012	.009	.016	.033
11	.008	.008	.010	.011	.010	.008	.018	.037
12	.008	.008	.009	.009	.008	.009	.022	.043
13	.007	.007	.008	.008	.008	.011	.026	.049
14	.007	.007	.008	.006	.008	.010		
15	.006	.006	.006	.005	.006	.007		
16	.005	.005	.006	.005	.006	.008		
17	.005	.005	.004	.004	.006	.009		
18	.004	.004	.004	.004	.007	.009		
19	.004	.004	.004	.005				
20	.004	.004	.004	.005				
21	.004	.004	.005	.006				
22	.004	.003	.004	.006				
23	.004	.003	.004	.007				
24	.004	.003						
25	.004	.004						
26	.004	.004						
27	.004	.004						
28	.004	.004						

Note: Based on separations due to death, disability and withdrawal combined.

\vm\jan92\av\mg1-tbl

ACTUARIAL SCIENCES ASSOCIATES INC.

Bell Atlantic Corporation

Annual Rates of Employee Separation From Service Before Eligibility to Service Retirement

Female Employees

Management

Service in years t	Rates of separation during year t + .5 to t + 1.5 for employees entering service at specimen ages							
	15	20	25	30	35	40	45	50
0	.095	.095	.094	.092	.088	.084	.079	.079
1	.083	.082	.077	.072	.068	.064	.063	.065
2	.070	.069	.065	.057	.047	.039	.032	.031
3	.058	.058	.056	.046	.029	.025	.026	.031
4	.050	.051	.052	.038	.020	.018	.020	.030
5	.042	.044	.047	.032	.017	.013	.015	.029
6	.040	.040	.042	.027	.015	.012	.013	.028
7	.040	.038	.031	.024	.015	.012	.012	.021
8	.039	.034	.024	.017	.015	.012	.012	.024
9	.036	.030	.021	.014	.013	.012	.012	.029
10	.034	.027	.018	.013	.013	.013	.013	.029
11	.030	.023	.016	.010	.012	.013	.014	.028
12	.026	.020	.016	.010	.010	.014	.015	.028
13	.023	.019	.015	.010	.009	.015	.015	.028
14	.019	.017	.013	.008	.006	.011		
15	.016	.015	.011	.006	.005	.007		
16	.012	.011	.010	.005	.005	.007		
17	.010	.009	.007	.004	.005	.006		
18	.008	.008	.006	.004	.005	.005		
19	.006	.006	.006	.004				
20	.006	.006	.005	.005				
21	.006	.006	.005	.005				
22	.006	.004	.003	.005				
23	.006	.004	.003	.005				
24	.005	.004						
25	.005	.003						
26	.004	.003						
27	.003	.003						
28	.003	.003						

Note: Based on separations due to death, disability and withdrawal

TABLE 1

Bell Atlantic Corporation

Annual Rates of Employee Separation From Service Before Eligibility to Service Retirement

Male Employees

Associate

Service in years t	Rates of separation during year t + .5 to t + 1.5 for employees entering service at specimen ages							
	15	20	25	30	35	40	45	50
0	.197	.185	.158	.135	.120	.115	.117	.120
1	.120	.110	.087	.068	.053	.044	.044	.045
2	.078	.070	.056	.046	.042	.040	.038	.039
3	.058	.051	.037	.034	.029	.030	.029	.027
4	.039	.035	.026	.026	.021	.025	.025	.024
5	.028	.026	.019	.021	.017	.021	.021	.024
6	.022	.021	.016	.017	.013	.018	.019	.022
7	.020	.019	.015	.015	.012	.016	.018	.022
8	.017	.016	.013	.014	.011	.014	.017	.026
9	.014	.014	.012	.012	.010	.014	.017	.029
10	.012	.012	.011	.011	.009	.014	.019	.034
11	.010	.010	.010	.011	.009	.014	.024	.037
12	.009	.010	.009	.010	.010	.016	.027	.043
13	.009	.010	.009	.010	.010	.016	.028	.050
14	.009	.010	.008	.009	.011	.018		
15	.009	.009	.008	.009	.011	.019		
16	.008	.008	.008	.009	.012	.020		
17	.007	.008	.008	.008	.012	.023		
18	.007	.008	.008	.008	.012	.026		
19	.006	.008	.007	.009				
20	.006	.008	.007	.010				
21	.006	.008	.007	.010				
22	.006	.008	.007	.010				
23	.006	.008	.007	.011				
24	.007	.007						
25	.007	.007						
26	.008	.007						
27	.008	.007						
28	.008	.007						

Note: Based on separations due to death, disability and withdrawal combined.

Bell Atlantic Corporation

Annual Rates of Employee Separation From Service Before Eligibility to Service Retirement

Female Employees

Associate

Service in years t	Rates of separation during year t + .5 to t + 1.5 for employees entering service at specimen ages							
	15	20	25	30	35	40	45	50
0	.208	.194	.164	.136	.113	.096	.086	.087
1	.148	.139	.115	.094	.075	.063	.056	.060
2	.116	.107	.087	.067	.051	.039	.031	.033
3	.079	.081	.072	.056	.040	.034	.034	.031
4	.071	.071	.058	.045	.033	.030	.029	.031
5	.066	.064	.048	.037	.029	.028	.028	.030
6	.062	.057	.044	.029	.026	.026	.027	.030
7	.057	.050	.037	.025	.024	.024	.027	.030
8	.053	.046	.030	.023	.022	.023	.027	.032
9	.049	.042	.026	.023	.021	.023	.027	.032
10	.044	.039	.026	.022	.021	.022	.027	.034
11	.040	.035	.026	.022	.020	.022	.027	.040
12	.035	.031	.024	.022	.020	.022	.027	.045
13	.031	.027	.022	.022	.020	.022	.027	.054
14	.029	.026	.020	.021	.020	.021		
15	.026	.024	.020	.021	.020	.020		
16	.022	.021	.020	.020	.019	.020		
17	.020	.020	.020	.019	.019	.019		
18	.018	.018	.020	.019	.017	.019		
19	.018	.018	.018	.019				
20	.017	.018	.018	.019				
21	.017	.018	.017	.017				
22	.016	.017	.016	.015				
23	.016	.016	.015	.016				
24	.015	.014						
25	.015	.014						
26	.015	.014						
27	.014	.014						
28	.013	.013						

Note: Based on separations due to death, disability and withdrawal combined.